

# **EXHIBIT 4**

## Ryan Cordell

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**From:** Louis F. Teran <lteran@slclg.com>  
**Sent:** Wednesday, August 7, 2024 12:22 PM  
**To:** Ryan Cordell; Courtney Ervin  
**Cc:** 'Cupar, David B.'; 'Cavanagh, Matthew J.'  
**Subject:** RE: URGENT - RE: Spectrum v. URZ URGENT

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Can you please provide me with a response to my email below. Given that the scheduled ESI collection is set for tomorrow, August 8, 2024, we need to plan accordingly. Your ESI vendor is still welcome to go to URZ's facility tomorrow after 6pm to do his imaging. But, per my email below, please note that I think he may need to take the computers to his/her shop for imaging since the computers do not appear to be working. We will only accommodate one not both. In other words, your ESI vendor can go to URZ's facility tomorrow at 6pm as originally planned or URZ can deliver the devices to his/her shop tomorrow morning to allow a full day of imaging. Please provide me with a response as soon as possible so we could plan accordingly.

Thank you

**Louis F. Teran**  
Attorney at Law  
**SLC Law Group**  
1055 E. Colorado Blvd., Suite #500  
Pasadena, CA 91106  
Phone: (818) 484-3217 x200  
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**From:** Louis F. Teran <lteran@slclg.com>  
**Sent:** Tuesday, August 6, 2024 3:27 PM  
**To:** 'Ryan Cordell' <rcordell@hicks-thomas.com>; 'Courtney Ervin' <cervin@hicks-thomas.com>  
**Cc:** 'Cupar, David B.' <dcupar@mcdonaldhopkins.com>; 'Cavanagh, Matthew J.' <mcavanagh@mcdonaldhopkins.com>  
**Subject:** RE: URGENT - RE: Spectrum v. URZ URGENT  
**Importance:** High

Mr Cordell,

I was just informed of a development which may help with the collection of ESI information. It seems that URZ's two computers stopped working late last week. It is not clear why the computers stopped working. As a result, URZ just acquired two new computers that it got installed and started using as of yesterday and today. So the two prior computers are no longer being used by URZ. These have been set aside and will be untouched until your imaging is completed.

Since the two computers are no longer of any use to URZ, we can have them delivered to your ESI vendor for imaging at his/her office. Although the computers are not working for URZ's purposes, I would hope that your ESI vendor can still pull the data from the drives. Besides, it seems that electricity and internet is still not fully reliable at URZ's facility. Also, since the computers are not working, your ESI vendor may need special equipment in his/her shop. In addition, this allows the imaging to take place during business hours without having anybody to work after 5pm.

If this is agreeable, I can coordinate with URZ to deliver the two computers and the cell phones to your ESI vendor first thing in the morning of Thursday, August 8. The courier would wait until the cell phones are completely imaged first and then return the cell phones to URZ. But your ESI vendor can keep the two computers for the full day for complete imaging. We can then arrange URZ to pick the computers up at the end of the day or the day after.

Let me know if this is agreeable.

Thank you

**Louis F. Teran**  
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---

**From:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>  
**Sent:** Monday, August 5, 2024 10:51 AM  
**To:** 'Ryan Cordell' <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>; 'Courtney Ervin' <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>  
**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>  
**Subject:** RE: URGENT - RE: Spectrum v. URZ URGENT

Correct. Terms of ESI collection are the same.

Thank you

**Louis F. Teran**  
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**SLC Law Group**  
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**From:** Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>  
**Sent:** Friday, August 2, 2024 12:09 PM  
**To:** 'Louis F. Teran' <[fteran@slclg.com](mailto:fteran@slclg.com)>; Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>  
**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>  
**Subject:** URGENT - RE: Spectrum v. URZ URGENT

Per your out-of-office, I am re-sending this message with URGENT in the subject line.



**D. Ryan Cordell, Jr.**  
Associate  
713-547-9130 | Phone  
713-547-9150 | Fax  
700 Louisiana Street, Suite 2300  
Houston, TX 77002  
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**From:** Ryan Cordell  
**Sent:** Friday, August 2, 2024 1:28 PM  
**To:** 'Louis F. Teran' <[fteran@slclg.com](mailto:fteran@slclg.com)>; Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>  
**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>  
**Subject:** RE: Spectrum v. URZ URGENT

Thank you, Louis. We will conduct the inspection and ESI collection on that date.

For the avoidance of doubt, I presume the time and terms for the ESI collection the same as in your prior correspondence? (except the difference in date):

"I am in receipt of your email below and your voicemail. URZ has just confirmed that it is ready for the inspection and ESI imaging to take place pursuant to the Court's Order on Monday, July 8, 2024 at 6 pm, as I indicated in my prior email. All the devices will be made available at that time along with all passwords, pins, or anything else needed for full access. As was previously discussed, the ESI imaging or collection must be done on-site. The devices cannot be removed from the site. Your ESI vendor will be able to stay there for as long as it takes to complete the imaging process. Since this will take place after business hours, there is no preference on which device to image first. Your ESI vendor can choose how to proceed with imaging. In addition, as required by the Court order, the facility will be available for physical inspection as well."

Thanks



**D. Ryan Cordell, Jr.**

Associate

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---

**From:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>

**Sent:** Wednesday, July 31, 2024 4:01 PM

**To:** Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>; Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** Re: Spectrum v. URZ URGENT

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I have confirmed with URZ that August 8 is agreeable for ESI collection.  
Feel free to contact me with any comments or questions.

Louis Teran

Sent from my Verizon, Samsung Galaxy smartphone  
Get [Outlook for Android](#)

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**From:** Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>

**Sent:** Tuesday, July 30, 2024 7:52:34 AM

**To:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>; Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** RE: Spectrum v. URZ URGENT

Louis – I'm sorry, I meant August 6, 7 or 8. Mr. Hughes is not available Aug. 9. I look forward to your response.

---

**From:** Courtney Ervin

**Sent:** Monday, July 29, 2024 3:00 PM

**To:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>; Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** RE: Spectrum v. URZ URGENT

Louis:

Spectrum can agree to schedule the ESI collection next week on either August 6, 7 or 9, but the date needs to be agreed to this week. Please let me know what date works for URZ.

Best regards,

Courtney

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**From:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>

**Sent:** Thursday, July 25, 2024 1:01 AM

**To:** Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>; Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** Re: Spectrum v. URZ URGENT

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I am in receipt of your email below. As I indicated previously, I am currently out of the country on vacation. In addition, as I indicated previously, the main representative for URZ is also out of the country on vacation scheduled to return on or around August 4. However, I will try to coordinate this with URZ for the week of August 2. I will let you know. However, being that the main representative returns on August 4, I think this can very likely be scheduled for the week of August 4. I will keep you posted.

Louis Teran

Sent from my Verizon, Samsung Galaxy smartphone

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**From:** Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>

**Sent:** Monday, July 22, 2024 11:32:53 PM

**To:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>; Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** RE: Spectrum v. URZ URGENT

Per your out of office, I am adding “URGENT” in the subject line.

---

**From:** Courtney Ervin

**Sent:** Monday, July 22, 2024 5:31 PM

**To:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>; Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** RE: Spectrum v. URZ

Louis,

You have stated that you will continue to work with URZ to ensure its compliance with the discovery order, but you have not provided an update. We assume power and internet at URZ’s facility have been reliably restored. Please confirm that is the case.

Assuming URZ has power and internet, please provide dates for the inspection of URZ’s facility and collection of ESI on the following dates: July 25 or July 29-Aug 2.

Regarding the passwords, the Court’s order, granted months ago, required URZ to provide information regarding its email accounts, including the passwords. These accounts may be imaged remotely. Per your request, Spectrum’s ESI vendor signed and is bound by the protective order entered in this case. Your expressed concern regarding fear that you would inadvertently disclose of your client’s highly confidential passwords is unfounded and is no basis for URZ’s continued violation of the Court’s Order. Regardless, we have repeatedly offered URZ the opportunity to speak directly with the ESI vendor, Mr. Hughes. Accordingly, please arrange to have the required information provided to him by July 24 so that he can begin the email collection.

As to why the ESI has not already been collected, the collection has been prevented by URZ’s ongoing failure to comply with the Court’s order. The collection should have been completed long before Hurricane Beryl.

Should URZ fail to permit the complete collection of data on or before August 2, Spectrum will seek further relief from the Court.

Best regards,

Courtney

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**From:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>

**Sent:** Friday, July 5, 2024 3:31 PM

**To:** Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Cc:** 'Cupar, David B.' <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>; 'Cavanagh, Matthew J.' <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** RE: Spectrum v. URZ

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I am in receipt of your email below and your voicemail. URZ has just confirmed that it is ready for the inspection and ESI imaging to take place pursuant to the Court’s Order on Monday, July 8, 2024 at 6 pm, as I indicated in my prior email. All the devices will be made available at that time along with all passwords, pins, or anything else needed for full access. As was previously discussed, the ESI imaging or collection must be done on-site. The devices cannot be removed from the site. Your ESI vendor will be able to stay there for as long as it takes to complete the imaging process. Since this will take place after business hours, there is no preference on which

device to image first. Your ESI vendor can choose how to proceed with imaging. In addition, as required by the Court order, the facility will be available for physical inspection as well

It is important to note that this entire process must be treated as HIGHLY CONFIDENTIAL pursuant to the Protective Order. I will need the signed Exhibit A from all the individuals that will be present or participate in this process.

Specific information regarding the devices will be provided on-site to the best of URZ's ability. Note that URZ is not an expert on these devices and may not know details of Operating System or size of hard drives. However, the devices will be made available and accessible for your ESI vendor to do its job.

I hope this addresses all the pending issues. Feel free to contact me with any comments or questions.

Thank you

**Louis F. Teran**

**Attorney at  
Law  
SLC Law  
Group**

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---

**From:** Ryan Cordell <[rcordell@hicks-thomas.com](mailto:rcordell@hicks-thomas.com)>

**Sent:** Friday, July 5, 2024 7:16 AM

**To:** Louis F. Teran <[lteran@slclg.com](mailto:lteran@slclg.com)>

**Cc:** Cupar, David B. <[dcupar@mcdonaldhopkins.com](mailto:dcupar@mcdonaldhopkins.com)>; Courtney Ervin <[cervin@hicks-thomas.com](mailto:cervin@hicks-thomas.com)>; Cavanagh, Matthew J. <[mcavanagh@mcdonaldhopkins.com](mailto:mcavanagh@mcdonaldhopkins.com)>

**Subject:** Spectrum v. URZ

Mr. Teran,

Thank you for providing the information requested in our May 9 Letter, and making URZ's facility and ESI available on Monday.

We will also need the following information to gather the ESI from the devices:

1. Hard Drive size for each computer – needed to estimate how long imaging of each computer will take
2. Operating System (OS) for each computer – needed to determine correct tools to take image
3. All access information including passwords, encryption keys, and PIN codes for each phone – needed to access the devices
4. All access information including usernames, passwords, encryption keys, administrator usernames and passwords for each computer – needed to access the devices

We would like to have a call with you today to talk over some details to ensure this process goes smoothly and efficiently. **Can you please advise of your availability today?** We would like to discuss topics such as the following:

1. Minimizing business disruption and device preference – for example, does URZ require that the computer acting as the server be imaged first so it can be back up and running as soon as possible? Would URZ prefer that we image the cell phones first so they can be returned to their owners?

2. Coordinat  
ion – for  
example,  
whether  
URZ

prefers  
Spectrum’s  
s vendor  
to  
perform

the ESI  
collection  
on-site, or  
whether  
URZ will

let  
Spectrum's  
vendor  
take the  
devices

back to  
his office  
for  
overnight  
processin

g and re-  
delivery  
when  
complete.  
Similarly,

if  
collection  
is to be  
performed  
on-site,



our  
vendor  
will need  
a suitable  
space to

perform  
the work  
and  
power.

3. Estimated timing and duration of the collection, which will depend on the size of the devices and location where the ESI is collected.

Thank you,



**D. Ryan Cordell, Jr.**

Associate

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